

RE: Notice of Proposed Rule Making

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From Terry G. Griner - W8TI
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FCC 11-11-0001 Privilege: Extra Class
 Licensed: January 1954

I have read the Proposed Rule Making and wish to give what I believe is pertinent feedback relative to the Licensed Amateur Radio community. I agree with the FCC that it is time to modernize the license process.

PROCEED WITH CAUTION: Changing the license process be beneficial or extremely harmful to Amateur Radio. There seems to be two camps lobbying for change. Those that want to make it easy to get a license so the Amateur population increases and those that resist change. Neither is good.

The easier we make it to obtain a license, the closer we approach the CB operation. The FCC does not need to be reminded of those results. The last data I've seen showed that over 90% of all interference result from CB operation. And look at the upper end of 75 and 20 meters if one needs embarrassing proof as to the results of easing the testing process and/or not enforcing the rules.

FEEDBACK ORGANIZATION:

To be concise, I will limit my discussion to recommendations/reasons for:

- Enforcement of Rules
- License Classes and Privileges
- License Testing

ENFORCEMENT OF RULES

Recommend: Use Amateur Radio volunteers to monitor for significant infractions. This body should be supervised and trained by a central organization, e.g. ARRL. The ARRL would be under the supervision of the FCC. Any serious and repeated infractions where the ARRL was not able to get the guilty party to cooperate would be forwarded to the FCC for appropriate action. The volunteers could send out notices warning stations of infractions through the ARRL. Volunteers could be ARRL officers, QSL bureau managers, amateur radio clubs, etc. **The main thing is that they must be trained to provide consistent feedback regarding infractions.**

Reason: This is an approach that was used by the FCC back in the '50's. When you received a post card regarding splatter, out of band, interference, etc., you corrected the problem and responded immediately. **The above approach removes the burden of policing the ham bands from the FCC and makes the Amateur community responsible to keep their own spectrum clean. This approach would also prevent "get-even" tactics.**

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LICENSE CLASSES AND PRIVILEGES

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CODELESS HF LICENSE

Recommend: If the testing process is improved, offering the general or advanced DIGITAL and PHONE privileges without a code exam would be practical. We should also designate a limited area on certain bands where they may operate CW (i.e., 14.050 to 14.075; 7.050 to 7.075, etc.).

Reason: Allowing the codeless operators to experiment with CW on certain HF bands would increase their interest to upgrade. It would be less intimidating since they would be working other hams that also have limited CW capability.

Comment: As much as I don't like it, the day will come when code is not a requirement to operate HF. The main objection is that since the 'watering-down' of the testing process, code is about the only filter that separates Amateur from CB operation. Thus the importance of strengthening the testing process.

MAINTAIN CW REQUIREMENTS FOR CW PRIVILEGES

Recommend: We should maintain the EXTRA class CW requirements and privileges as they exist today. We also need to offer a CW endorsement for all classes to operate the rest of the CW frequencies (same general/advanced CW privileges that exist today).

Reason: Amateur radio should still offer incentives to upgrade if you want the full privileges. It would be unfair to mix 20-wpm operators with those struggling at 5 to 12 wpm. The beginners would get intimidated and quit if they didn't have an area of their own to practice. That is why upgrading from the old Novice class was so easy. Nothing beats 'hands on' experience with peers.

LICENSE TESTING**TESTING CONTENT:**

Recommend: Modernizing the content to contain less technical detail is appropriate. Since most hams purchase their rigs and antennas, testing for technical knowledge can be reduced. However, the test should stress items that are necessary for good operation. A few examples are:

- Techniques to eliminate interference
- Installation procedures and how to tune up a transmitter
- Demonstrate to VEC ability to put a station on the air and make a QSO
- Rules, regulations and safety
- Good operating techniques and courtesy
- Technical level so people are qualified to repair/service transmitting equipment

Reason: The study preparation for the current test and the migration path from 2 meters to HF is not sufficient to make responsible HF operators. When the migration path into Amateur Radio was from the Novice License, one was forced to learn the fundamentals of putting a rig on the air. When I was studying for the Novice License, I swore that I'd never work CW again. After I made my first contact, I found it was fun and CW has been a part of my operation ever since.

Real stories: An officer in our club got his general license over two years and is still afraid to use his HF rig. I helped him tune his vertical antenna and showed him how to load his 300 watt rig. The class that taught him to get a license had him memorize all of the questions and the associated answer. He passed, but is so lacking in the support knowledge that is required to put a station on the air that he refuses to try. He is not alone. Recently, I joined in a conversation with 3 hams on 2 meters that were discussing how they got their licenses over one year ago and still never had the nerve to put their rigs on HF. All of them had the rigs installed. If you want a condition for causing interference, consider those that are equally prepared, but are not bashful.

TESTING PROCEDURE:

Recommend: Distribute a pool of potential questions for study. The exam should consist of a subset of questions that are paraphrased slightly differently. The exact exam each applicant receives is a random distribution from a set of standard tests that are periodically changed.

Reason: This would prevent memorizing questions and answers and require the applicant to understand the fundamentals.

Frightening but true story: A very experience ham, licensed in '30's, had a strong background in broadcast stations. He taught numerous non-technical guys and gals that passed their FCC exam during the '50's. A few years ago, the local club needed someone that understood receivers to handle that part of the class. Members of the club recommended him. During the first hour, he drew a simple block diagram and explained the purpose of the main elements of a simple receiver. During the break, the VEC told him, "That's not the way we teach our class. Just read them the questions and tell them which is the correct answer and why." He told the VEC they don't need him for that and left. Need one wonder why we find so many poorly prepared hams.

CLOSING

I agree with the other items in the FCC proposal. Especially that no existing license should lose privileges. Also that the FCC should reject the delaying tactics used by small groups that keep submitting slightly modified proposals to prevent enactment of an enhanced ruling.

Thank you for taking the time to read my suggestions and I hope they have been of some help.

Good luck. *Terry*

Cc: ARRL, Mr. Rick Lindquist, 225 Main Street, Newington, CT 06111-1494